

**To develop a Case Management system for the State of New Hampshire that is conflict free. Target date for full compliance: August 31, 2021**

| Action Items                       | Start Date | Completion Target Date      | Responsible Office                     | Milestone   | Desired Outcome  | Status  | Date       | Completion Date |
|------------------------------------|------------|-----------------------------|--|---|--|---|------------|-----------------|
| Sharing and Stakeholder Engagement | 02/03/2017 | 03/15/2017<br>(and ongoing) | Bureau of Developmental Services (BDS) | 1. Current Case Management Providers, families, consumers, etc. are informed that changes are required.   | Stakeholders have a clear understanding of why changes are required.                         | Completed<br><br>Two letters were sent out, February 13, 2017 and May 26, 2017.   | 06/26/2017 | 02/13/2017      |
|                                    | 02/03/2017 | 02/15/2017                  | BDS                                    | 2. Written communication will go out to all families, providers and stakeholders notifying them of the need for change and the plan to engage them throughout the process (assuring them of the state's efforts to minimize disruption for individuals served). | Clear, concise information is shared.  | Completed<br><br>Two letters were sent out, February 13, 2017 and May 26, 2017.   | 06/26/2017 | 02/13/2017      |
|                                    | 03/15/2017 | 04/15/2017                  | BDS                                    | 3. Specific Process that BDS will take moving forward will be communicated.   | Clear, concise information is shared with timelines.   | Corrective Action Plan Information Session held on May 16, 2017. One Hundred and Thirty (130) people were in attendance. Additional letter sent out on May 26, 2017. All information posted on BDS' Website.        | 06/26/2017 | 05/30/2017      |
| Stakeholder Workgroup developed    | 04/01/2017 | 05/01/2017                  | BDS                                    | 1. Representatives including providers, families, and other stakeholders will be identified for the BDS workgroup guiding this change.  | Shared participation and decision making, including many opportunities for meaningful input. | Stakeholder Group formed. Invitation letter went out April 10, 2017. All attended the May 16, 2017 information session and first formal meeting was held on June 21, 2017. Fifty (50) people attended this session. | 06/26/2016 | 04/10/2017      |

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| Assessment of current case management system functioning<br><br>Develop Report | 05/01/2017 | 12/01/2017             | BDS                | 1. Develop and implement survey to case management participants. | From consumer/family perspective, with a focus on choice determine: what is working, what is not working, what needs to be changed, what needs to remain the same. | Survey Completed.  | 12/28/2017 | 12/01/2017      |
|  | 05/01/2017 | 12/01/2017             | Stakeholders       | 2. Review NCI data regarding case management.                    | Satisfaction, areas for improvement while implementing change.   | Summarized and to be shared at next Stakeholder Meeting.   | 12/28/2017 | 12/01/2017      |
|  | 05/01/2017 | 12/01/2017             | Consultants        | 3. Service System Mapping.                                       | Identify which areas are conflict free, which areas are not, which areas are in-between, and areas where the regulatory exception applies.                         | The tool has been developed and BDS has conducted ten sessions with the Area Agencies. Completed, but will continue to work on additional data elements as needed. | 12/28/2017 | 12/01/2017      |
|  | 05/01/2017 | 10/01/2017             | BDS Consultants    | 4. Review claims data.   | 1. Which providers are providing case management, direct services for clients.<br>2. Establish number of individuals will be impacted by COI mitigation.           | Completed  | 12/28/2017 | 10/01/2017      |
|  | 05/01/2017 | 12/31/2018             | BDS Consultants    | 5. Assess provider capacity.                                     | 1. Understanding of provider capacity and workforce issues.<br>2. Can current providers accommodate?<br>3. Are additional providers needed?                        | Initial phase completed  | 12/28/2017 | 12/28/2017      |
|  | 05/01/2017 | 12/31/2018             | BDS Consultants    | 6. Assess role of case management in existing agencies.          | Determine what is being done that will need to be modified in a case management system free from conflict of interest.   | Initial phase completed.   | 12/28/2017 | 12/28/2017      |
|  |            |                        |                    |  |  |  |            |                 |

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| Assessment of current case management system functioning | 05/01/2017 | 06/01/2019             | BDS Consultants    | 7. Rate Structure.   | Is the case management rate sufficient for stand alone case management?               | Data collected, need to work on the actual structure.                          | 12/28/2017 |                 |
| Develop Report (continued)                               | 12/01/2017 | 01/01/2018             | BDS                | 8. Report out on what data is telling NH.  | Road map for future work.   | Will be done at the next Stakeholder Meeting in January.                       | 12/28/2017 |                 |
|  | 12/01/2017 | 09/01/2018             | BDS                | 9. Evaluate options for compliance (informed by technical assistance).   | Determine data-informed, geographic area-tailored solutions.                          | In process, not fully completed  | 12/28/2017 |                 |
| Cost Allocation Plan                                     | 09/15/2017 | 06/01/2021             | BDS DHHS           | NH will work on a cost allocation plan for the Fiscal Intermediary Services  | This will ensure there is no Conflict of Interest for the provision of this function. | BDS is currently conducting research in this area.                             |            |                 |
| Service Gap Identification                               | 11/01/2017 | 01/31/2018             | BDS Stakeholders   | For gaps identified in Assessment phase, determine any gaps that may exist in new system.  | 1. Plan for resolution of identified gaps in the Service Delivery System.             | The data collected from the Mapping Exercise will be used to assist with this. |            |                 |
| Law and Rule Review and Revision                         | 12/01/2017 | 07/01/2021             | BDS                | 1. Identify laws and rules that will need to be amended for compliance in new system.<br>2. Implement law and rule revision process. | Rules will be compliant for 08/31/2021 full implementation.                           |  |            |                 |
| Rate Modeling  | 12/01/2017 | 12/31/2019             | BDS                | 1. Review of Case Management Rates.  | 1. Are they sufficient to meet the new system?  |  |            |                 |
|  | 12/01/2017 | 12/31/2019             | Consultants        |  | 2. Do they need to be modified?   |  |            |                 |
|  | 12/01/2017 | 12/31/2019             | BDS                |  | 3. If they need to be modified, request additional funding for SFY 2022               |  |            |                 |

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| Development of Implementation Plan | 01/01/2018 | 12/31/2018             | BDS  | Demonstrate how NH will come into compliance.  | 1. Outline plan for each area of state to not exceed 07/01/2021. The plan will take into account workforce and other capacity issues for each part of the state.             |        |      |                 |
|                                    | 01/01/2018 | 01/01/2019             | BDS  | Identify areas within the state that may have only one willing and qualified provider.   | Those areas that meet this regulatory provision will be identified. Plans will be developed to ensure choice and separation of duties and reporting within the organization. |        |      |                 |
|                                    | 01/01/2018 | 01/01/2019             | BDS  | BDS will develop an Only Willing and Qualified Provider Tool.  | Assist agencies, families, providers, and BDS to develop process for when an agency is required to provide both case management and direct service.                          |        |      |                 |
|                                    | 01/01/2018 | 06/01/2019             | BDS  | Each Area Agency will submit their implementation plan for approval by BDS.  | Each agency will address compliance and consumer safeguards.   |        |      |                 |
|                                    | 01/01/2018 | 09/01/2019             | BDS Consultants                                  | Performance measures developed and process defined to ensure free choice by waiver participants.   | 2. Identify bench marks and compliance indicators.   |        |      |                 |
|                                    | 01/01/2018 | 12/31/2018             | BDS Stakeholder Advisory Group Members Providers | Development of written material that clearly communicates choice and the process to request separation of case management and direct services. | Participants will have information regarding choice and know how to request separation of case management and direct services.   |        |      |                 |
|                                    |            |                        |  |  |  |        |      |                 |

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| Gap Plan                                    | 02/01/2018 | 07/01/2019             | BDS Stakeholders                  | Develop plan to meet identified gaps.   | There will not be gaps of services- direct services or case management.   |        |      |                 |
| Determine funding needed for implementation | 02/01/2018 | 07/01/2021             | BDS                               | Is additional funding needed? Develop budget request for SFY 2022/2023 budget.  | Sufficient funding for change to a system free of COI.  |        |      |                 |
| Development of Implementation Plan          | 03/10/2018 | 12/31/2019             | BDS Consultants                   | Choice is offered to all waiver participants. No new entrants to the waiver will be allowed to have the same provider provide both case management and direct service, unless can demonstrate they are only and willing provider. | Quality measure developed to ensure choice is offered.  |        |      |                 |
|   | 04/01/2018 | 07/01/2019             | BDS                               | Process developed for annual and quarterly review of choice for participants.   | Participants will have the ability to request a separation and change of service at any time.                                       |        |      |                 |
|   | 04/01/2018 | 09/01/2018             | BDS                               | Process, design & outline for new entrants to waiver.   | Separation of service delivery and case management 01/01/2019, unless agency is only & willing provider for new entrants to waiver. |        |      |                 |
| Case Management System                      | 02/01/2019 | 12/31/2020             | BDS with stakeholder engagement   | Case Management Orientation developed.  | All providers of Case Management will receive the required training necessary to carry out the responsibilities.                    |        |      |                 |
| Quality Improvement                         | 10/01/2019 | Ongoing                | BDS (with stakeholder engagement) | Quality improvement strategies for restructured case management delivery system.  | Develop strategies and performance measures to ensure strong case management and strong individual autonomy and choice.             |        |      |                 |

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| Contract Development       | 07/01/2020 | 06/01/2021             | NH DHHS Contract Unit           | Contracts for Case Management Providers.                              | Develop contracts/provider agreements for Case Management Providers. Contracts executed for 7/1/2021. |        |      |                 |
| Case Management Transition | 01/01/2021 | 08/30/2021             | BDS                             | 1. Seamless transition from one organization to another, if required. | Case Management System in NH compliant with the regulatory conflict of interest provisions.           |        |      |                 |
|                            | 01/01/2021 | 08/30/2021             | Area Agencies / Case Management |   |   |        |      |                 |
|                            | 01/01/2021 | 08/30/2021             | Provider Agencies               |   |   |        |      |                 |

**To assure NH's Developmental Services Organized Health Care Delivery System:**  
**a) permits providers to waive their right of direct payment and accept their payment through the OHCDs: and**  
**b) offers the provision of and system for providers without assigning payment through the OHCDs**

**To be completed by August 31, 2021**

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|---|------------|-------------------|--------------------|---|--|---|------------|-----------------|
| Inform Providers of the need to develop a Direct Payment Option | 04/01/2017 | 04/15/2017        | BDS                | 1. Current Direct Delivery Providers, families, consumers, etc. are informed that changes are required to comport with 1902(a)(32) direct payment provisions.   |  | Completed   | 3/8/2017   | 02/13/2017      |
|   | 04/01/2017 | 04/15/2017        | BDS                | 2. Written communication will go out to all families, providers and stakeholders notifying them of the need for change and the plan to engage them throughout the process (assuring them of the state's efforts to minimize disruption for individuals served). | Clear, concise information is shared.                | Completed   | 3/8/2017   | 02/13/2017      |
|   | 04/01/2017 | 05/30/2017        | BDS                | 3. Specific Process that BDS will take moving forward will be communicated.   | Clear, concise information is shared with timelines. | Corrective Action Plan information session held on May 16, 2017, with 130 people in attendance. An additional letter was sent out on May 26, 2017. All information is posted on BDS' Website. | 06/26/2017 | 05/30/2017      |
| Responsibilities for direct bill providers outlined             | 07/01/2017 | 01/01/2020        | BDS                | 1. Responsibilities will be defined between the Area Agency and Direct Bill Provider.   |  | Reviewing data from environmental scan, work in in process.   | 12/28/2017 |                 |

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| Identify system (both IT and general infrastructure) adjustments that are necessary to effectuate the changes       | 07/01/2017 | 01/01/2020        | BDS  | 1. identify staffing and IT resources needed.   | Align with BDS IT RFP process.   | A Request for Information has gone out and responses are being collected. An Request for Proposal will be released in January for a consultant to work with BDS on developing a system. | 12/28/2017 |                 |
|   | 12/01/2017 | 12/31/2020        | BDS in collaboration with NH's MMIS Vendor (Conduent). | 1. Establish changes; beta test systems adjustments and process improvements.   |  | This has not been started.  | 12/28/2017 |                 |
| Policies and Guidelines and Rule Changes Developed (New Hampshire must amend regulations to effectuate this change) | 01/01/2018 | 01/01/2021        | BDS  | 1. Responsibilities will be outlined as to the roles of each party.   |  |   |            |                 |
| Role of Oversight for OHCDs determined  | 01/01/2018 | 01/01/2021        | BDS  | Clear understanding of the role of the Area Agency both when providers choose to direct bill or when they reassign their payment to the OHCDs, and BDS' oversight strategies and quality improvement. | Clear role identification and expectations for BDS and Area Agencies (in fulfillment of their various activities). |   |            |                 |



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| OHCDs Administrative Fee              | 01/31/2018 | 03/01/2021        | BDS                                       | Fee developed and approval/authorization for administrative claiming.           | To ensure continued oversight at a community level of service delivery; Cost allocation plan adjustment. |        |      |                 |
| Cost Allocation and Plan              | 02/01/2018 | 12/31/2020        | BDS<br>DHHS                               | NH will work on a cost allocation plan and/or rate structure for OHCDs.         | This will ensure there is a mechanism to pay for the OHCDs function.                                     |        |      |                 |
| Provider Certification Developed      | 05/01/2018 | 12/31/2020        | BDS<br>DHHS<br>Certification              | Provider Certification Process developed for those that direct bill.            | Qualified providers that meet regulatory and quality framework.  |        |      |                 |
| Prior Authorization Process Developed | 01/01/2020 | 12/31/2020        | BDS<br>DHHS                               | Prior Authorization Process developed for those that direct bill.               |  |        |      |                 |
| Training and Work Plan Developed      | 07/01/2020 | 12/31/2020        | BDS                                       | Based on the outcome of above, a work plan and training plan will be developed. |  |        |      |                 |
| Contract Development                  | 07/01/2020 | 03/31/2021        | BDS<br>DHHS<br>Contracting unit           | 1. Contracts updated for OHCDs.   |  |        |      |                 |
| Medicaid Enrollment Process           | 01/01/2021 | 07/01/2021        | Conduent (NH-MMIS Vendor) & BDS Providers | Providers will enroll as Medicaid providers.                                    |  |        |      |                 |

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| Information shared with Providers   | 01/01/2021 | 03/31/2021        | BDS                | 1. Information will be shared with providers on the direct bill process. It will clearly outline the responsibilities associated. | Clear, concise information is shared, including system requirements.   |        |      |                 |
| Billing and Prior Authorization Training  | 03/01/2021 | 07/01/2021        | BDS                | Training for providers who will direct bill.  | To ensure providers are aware of the required steps to ensure payment. |        |      |                 |